

1 Robert J. Giuffra, Jr. (*admitted pro hac vice*)
giuffrar@sullcrom.com
2 Sharon L. Nelles (*admitted pro hac vice*)
nelless@sullcrom.com
3 William B. Monahan (*admitted pro hac vice*)
monahanw@sullcrom.com
4 SULLIVAN & CROMWELL LLP
125 Broad Street
5 New York, New York 10004
Telephone: (212) 558-4000
6 Facsimile: (212) 558-3588

*Attorneys for Volkswagen AG and
Volkswagen Group of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: VOLKSWAGEN “CLEAN DIESEL”
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2672 CRB (JSC)

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
AWARD OF ATTORNEYS' FEES,
COSTS AND EXPENSES**

17 | This Document Relates to:

The Honorable Charles R. Breyer

18 || *Clendenen v. Volkswagen*, No. 18-cv-7040

Coen v. Volkswagen, No. 18-cv-6966

19 || *Ortiz v. Volkswagen*, No. 18-cv-6951

20 | Riley v. Volkswagen, No. 17-cv-2897

21 | *Robertson v. Volkswagen*, No. 18-cv-6956

Salzer v. Volkswagen, No. 18-cv-7050

22 Salzer v. Volkswagen, No. 18-cv-7050

1 This Stipulation is entered into by and among the plaintiffs in the above-captioned actions
 2 (“Plaintiffs”) and Defendants Volkswagen AG and Volkswagen Group of America, Inc. (“Volkswagen”;
 3 together with the Plaintiffs, the “Parties”).

4 WHEREAS, on March 20, 2023, five law firms—the Knight Law Group LLP (“Knight
 5 Law”), Glaser Weil Fink Howard Jordan & Shapiro LLP (“Glaser Weil”), the Center For Constitutional
 6 Litigation (“CCL”), the Auto Fraud Legal Center (“AFLC”), and Greines, Martin, Stein & Richland, LLP
 7 (“GMSR,” together “Plaintiffs’ Counsel”—filed motions for attorneys’ fees (ECF Nos. 8140, 8141, and
 8 8143) and for other costs (ECF No. 8142; together, the “Motions”) on behalf of Plaintiffs;

9 WHEREAS, on June 21, 2023, following briefing, the Court issued an Order Awarding
 10 Fees and Costs (ECF No. 8181; the “Order”), in which the Court held that certain fees and costs were
 11 recoverable and that certain fees and costs were not recoverable; and

12 WHEREAS, in the Order, the Court directed the Parties to file a joint proposed order with
 13 stipulated awards for each firm consistent with the Court’s Order.

14 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and among the Parties, through
 15 their undersigned counsel, and subject to the approval of the Court, that the total awards for each Plaintiffs’
 16 Counsel are as follows:

Plaintiffs’ Counsel	Fee Award	Cost Award
Knight Law	\$15,955.48	\$15,458.05
Glaser Weil	\$2,834.90	None
CCL	\$782.23	None
AFLC	\$4,755.49	None
GMSR	\$28,730.55	None

24
 25 IT IS SO STIPULATED.
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1 Dated: July 5, 2023

Respectfully submitted,

2 /s/ Robert J. Giuffra, Jr.

3 Robert J. Giuffra, Jr. (*admitted pro hac vice*)
4 giuffrarr@sullcrom.com
5 Sharon L. Nelles (*admitted pro hac vice*)
6 nelless@sullcrom.com
7 William B. Monahan (*admitted pro hac vice*)
8 monahanw@sullcrom.com
9 SULLIVAN & CROMWELL LLP
10 125 Broad Street
11 New York, New York 10004
12 Telephone: (212) 558-4000
13 Facsimile: (212) 558-3588

14 *Attorneys for Volkswagen AG and
15 Volkswagen Group of America, Inc.*

16 /s/ Robert S. Peck

17 Robert S. Peck (*admitted pro hac vice*)
18 CENTER FOR CONSTITUTIONAL
19 LITIGATION, P.C.
20 1901 Connecticut Ave. NW
21 Suite 1008
22 Washington, DC 20009
23 (202) 944-2874
24 robert.peck@cclfirm.com

25 /s/ Gregory T. Babbitt

26 Gregory T. Babbitt
27 greg@autofraud.com
28 AUTO FRAUD LEGAL CENTER LLP
9988 Hibert Street, Suite 150
San Diego, CA 92131

29 /s/ Jacob W Cutler

30 Jacob W. Cutler
31 jacobc@knightlaw.com
32 KNIGHT LAW GROUP, LLP
33 10250 Constellation Ave, Suite 2500
34 Los Angeles, CA 90067

/s/ Jeffrey Gurrola
Cynthia E. Tobisman (SBN 197983)
ctobisman@gmsr.com
Jeffrey Gurrola (SBN 285157)
jgurrola@gmsr.com
GREINES, MARTIN, STEIN &
RICHLAND LLP
6420 Wilshire Boulevard, Suite 1100
Los Angeles, California 90048
Telephone: (310) 859-7811
Facsimile: (212) 558-3588

Fred D. Heather (SBN: 110650)
fheather@glaserweil.com
GLASER WEIL FINK HOWARD
JORDAN & SHAPIRO LLP
10250 Constellation Blvd. 19th Floor
Los Angeles, CA 90067
Telephone: (310) 553-3000
Facsimile: (310) 556-2920

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 6, 2023

The Honorable Charles R. Breyer
UNITED STATES DISTRICT JUDGE